

Confirmation Hearing Date & Time: April 24, 2025 at 11:00 a.m. (ET)

Confirmation Objection Deadline: April 15, 2025 at 4:00 p.m. (ET)

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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re

Chapter 11

ZHANG MEDICAL, P.C., d/b/a  
NEW HOPE FERTILITY CENTER

Case No. 23-10678 (PB)

Debtor.  
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**NOTICE OF COMBINED HEARING TO CONSIDER  
FINAL APPROVAL OF DISCLOSURE STATEMENT AND  
CONFIRMATION OF DEBTOR'S PLAN OF REORGANIZATION**

**PLEASE TAKE NOTICE THAT** on November 14, 2024, Zhang Medical P.C., d/b/a New Hope Fertility Center (the “**Debtor**”)<sup>1</sup>, the above-captioned debtor and debtor-in-possession, filed the *Second Amended Plan of Reorganization of Zhang Medical P.C., d/b/a New Hope Fertility Center Under Chapter 11 of the Bankruptcy Code* (ECF Doc. No. 443) (as amended, supplemented or otherwise modified from time to time, the “**Plan**”) and the *Second Amended Disclosure Statement for Second Amended Plan of Reorganization of Zhang Medical P.C., d/b/a New Hope Fertility Center Under Chapter 11 of the Bankruptcy Code* (ECF Doc. No. 444) and

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meanings set forth in the Plan or the Disclosure Statement, as applicable.

related exhibits (as amended, supplemented or otherwise modified from time to time, the “**Disclosure Statement**”).

**PLEASE TAKE FURTHER NOTICE THAT** on November 20, 2024, the United States Bankruptcy Court for the Southern District of New York (the “**Court**”) entered an order (ECF Doc. No. 449) (the “**Disclosure Statement Order**”) approving, among other things, the adequacy of the Disclosure Statement on an interim basis and authorizing the Debtor to provide notice of its intent to seek confirmation of the Plan. The Court’s interim approval of the Disclosure Statement is subject to notice and a hearing on the Debtor’s request for final approval thereof and further subject to the right of any party in interest to timely object to final approval of the Disclosure Statement and/or confirmation of the Plan. By such interim approval, the Court has not determined whether the Disclosure Statement should be approved on a final basis or whether the Plan should be confirmed.

**PLEASE TAKE FURTHER NOTICE THAT** as discussed at the hearing in the Debtor’s case held February 12, 2025, the “**Exhibit Filing Date**”<sup>2</sup> shall be **April 8, 2025 at 5:00 p.m. (ET)**.

**PLEASE TAKE FURTHER NOTICE THAT** a combined hearing to consider final approval of the Disclosure Statement and confirmation of the Plan (the “**Confirmation Hearing**”) will commence on **April 24, 2025 at 11:00 a.m. (ET)** before the before the Honorable Philip Bentley, United States Bankruptcy Judge of the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton U.S. Custom House, Room 601, One Bowling Green, New York, New York 10004. Please be advised that the Confirmation Hearing may be continued from time to time by the Court or the Debtor without further notice other than by such adjournment

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<sup>2</sup> The “**Exhibit Filing Date**” is defined in the Plan as “the last date by which forms of the exhibits to the Plan shall be filed with the Bankruptcy Court, which date shall not be later than 7 days prior to the deadline for objections to approval of the Disclosure Statement on a final basis and confirmation of the Plan.”

being announced in open court or by a notice of adjournment filed with the Court and served on parties entitled to notice under Bankruptcy Rule 2002. In accordance with the Plan, the Plan may be modified, if necessary, prior to, during, or as a result of the Confirmation Hearing by further action of the Debtor and without further notice to or action, order, or approval of the Court.

**PLEASE TAKE FURTHER NOTICE THAT** objections (each, an “**Objection**”), if any, to confirmation of the Plan must: (a) be in writing, (b) state the name and address of the objecting party and the amount and nature of the claim or interest of such party, (c) state with particularity the basis and nature of any objection or proposed modification, and (d) be filed with the Clerk of the Court, with a copy delivered to Chambers by email to [pb.chambers@nysb.uscourts.gov](mailto:pb.chambers@nysb.uscourts.gov), and served so that they are received on or before **April 15, 2025 at 4:00 p.m. (ET)** (the “**Confirmation Objection Deadline**”) upon (i) the Debtor, Zhang Medical P.C., d/b/a New Hope Fertility Center, 4 Columbus Circle, 4th Floor, New York, New York 10019, Attn: Charles N. Persing, Chief Restructuring Officer ([cpersing@bederson.com](mailto:cpersing@bederson.com)); (ii) co-counsel to the Debtor, Ruskin Moscou Faltischek, P.C., 1425 RXR Plaza, East Tower, 15th Floor, Uniondale, New York 11556, Attn: Sheryl P. Giugliano and Michael S. Amato ([sgiugliano@rmfpc.com](mailto:sgiugliano@rmfpc.com); [mamato@rmfpc.com](mailto:mamato@rmfpc.com)); (iii) co-counsel to the Debtor, Pardalis & Nohavicka LLP, 35-10 Broadway, Suite 202, Astoria, New York 11106, Attn: Norma Ortiz ([norma@ortizandortiz.com](mailto:norma@ortizandortiz.com)); (iv) Office of the U.S. Trustee — NY Office, Alexander Hamilton Custom House, One Bowling Green, Room 534, New York, New York 10004-1408, Attn: Rachael E. Siegel ([rachael.e.siegel@usdoj.gov](mailto:rachael.e.siegel@usdoj.gov)); and (v) all parties who have requested service of all motions and pleadings pursuant to Bankruptcy Rule 2002.

**PLEASE TAKE FURTHER NOTICE THAT** unless an Objection is timely filed and served by the Confirmation Objection Deadline in accordance with this Notice, it may not be considered by the Court at the Confirmation Hearing.

**PLEASE TAKE FURTHER NOTICE THAT** the deadline for the Debtor (and other parties in support of the Plan) to file a reply to any Objections to the final approval of the Disclosure Statement and confirmation of the Plan is **April 21, 2025 at 12:00 p.m. (ET)**.

**PLEASE TAKE FURTHER NOTICE THAT** any pleadings in this case may be obtained from the Court's website at <http://www.nysb.uscourts.gov> (in accordance with the procedures and fees set forth therein).

Dated: Uniondale, New York  
March 5, 2025

**RUSKIN MOSCOU FALTISCHEK, P.C.**  
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